

PATENT APPLICATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

GROUP ART UNIT: 3621

EXAMINER: FIRMIN BACKER

In re application of: Dushyant
Sharma

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For: ELECTRONIC BILL
PRESENTMENT AND
PAYMENT SYSTEM AND
PROCESSES

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Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF

Sir:

Appellant, pursuant to 37 C.F.R. § 41.37, hereby files this Appeal Brief as
part of the appeal on the above-referenced patent application.

<i>CERTIFICATE OF TRANSMISSION UNDER 37 CFR 1.8</i>			
I hereby certify that this Petition and all accompanying documents are, on the date indicated below, being transmitted to the United States Patent and Trademark Office via the Electronic Filing System.			
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I. Real Party in Interest

The real party in interest in this application is Metavante Corporation, the recorded assignee of the entire title of the subject application.

II. Related Appeals and Interferences

There are no other related appeals or interferences.

III. Status of Claims

Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50 and 82-97 are pending in the case, and are all finally rejected. Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50 and 82-97 are being appealed, and a copy of these claims is attached hereto as the Claims Appendix. Claims 1, 11, 12, 14-16, 18-21, 31, 35-38, 40, 44-49, and 51-81 have previously been cancelled.

IV. Status of Amendments

A July 18, 2005, amendment to the claims was the last amendment to be made to the claims, and was entered and considered. There was no post-final rejection amendment, leaving Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50 and 82-97 pending.

V. Summary of Claimed Subject Matter

Two independent claims are involved in this appeal: Claims 82 and 88. A concise explanation of the subject matter defined in each of these two independent claims will be described below, together with references to the specification of the

application as filed by page and line numbers, and to the drawings by reference numerals.

Claim 82. Claim 82 is directed to "[an] electronic bill presentment and payment system for presenting and paying bills via an electronic data network". An exemplary electronic bill presentment and payment platform in accordance with the present invention is 10 in Fig. 2, and is described in the specification from page 24, line 13 to page 32, line 13. The electronic data network is 21 in Fig. 2 and is described in the application specification at page 24, lines 17-22. The claimed system has five (5) elements, each of which will be briefly discussed and references to the specification and drawings will be identified.

Claim 82, element (a). An input processing functionality adapted to receive billing data from a plurality of billers in a plurality of different billing data forms. Billers are 12 in Fig. 2. An input processing engine is 22 in Fig. 2 and is described in the application specification from page 25, line 12 to page 26, line 4, as having the functionality of receiving biller data 23 from billers 12 in any form or format provided by any biller 12. (See also page 25, line 1 through page 25 line 11 of the application specification.)

Claim 82, element (b). A parsing functionality adapted to parse the billing data received from the plurality of billers in a plurality of different billing data forms to transform the billing data into a common document model wherein the transformed billing data is all of the same form. A rules based parsing engine

is 24 in Fig. 2 and is described in the application specification from page 26, line 5 through page 28, line 2 as operating on or parsing a wide variety of biller data types and formats in order to fit a common document or data model.

Claim 82, element (c). A database adapted to store the transformed billing data parsed by the parsing functionality. The database is 26 in Fig. 2. The output from the parsing engine is stored in the database as described in the application specification at page 27, line 20 through page 28, line 2.

Claim 82, element (d). A presentation functionality coupled to the database and adapted to retrieve transformed billing data from the database and to output at least some of the retrieved transformed billing data via the electronic data network for use by bill payers. Bill payers are customers 18 in Fig. 2. Presentment processors are 42 and 44 in Fig. 6 and are described in the application specification at page 30, line 10 through page 32 line 13. The presentment processors communicate with the database 26 to retrieve data therefrom and present it in a desired manner to a customer 18 via the electronic data network (infrastructure 21) as described in the application specification at page 30, line 18 through page 31, line 11.

Claim 82, element (e). Biller interactivity functionality coupled to the database and adapted to allow the plurality of billers individually to retrieve and review transformed billing data from the database and to alter the transformed billing data in the database. Presentment processors are 42 and 44 in Fig. 6 and

are described at page 30, line 10 through page 32 line 13 of the application specification. The platform 10 provides billers 12 with an interface to database 26 and presentation processors 42 and 44 which enables billers to manage the administrative functions of electronic billing, including retrieving and reviewing billing data from the database and altering the data in the database in various ways as described in the application specification at page 31, line 12 through page 32, line 13.

Claim 88. Claim 88 is directed to "[a] method for presenting and paying bills via an electronic data network". A method in accordance with the present invention is illustrated in Fig. 3 and is described in the specification at page 28, lines 3-21. An exemplary system for performing the method in accordance with the present invention is 10 in Fig. 2, and is described in the specification from page 24, line 13 to page 32, line 13. The electronic data network is 21 in Fig. 2 and is described in the application specification at page 24, lines 17-22. The claimed method has five (5) elements, each of which will be briefly discussed and references to the specification and drawings will be identified.

Claim 88, element (a). Receiving electronic billing data from a plurality of billers in a plurality of different billing data forms. Billers are 12 in Fig. 2. An input processing engine is 22 in Fig. 2 and is described in the application specification from page 25, line 12 to page 26, line 4, as having the functionality of receiving biller data 23 from billers 12 in any form or format

provided by any biller 12. (See also page 25, line 1 through page 25 line 11 of the application specification.)

Claim 88, element (b). Parsing in a computer the electronic billing data received from the plurality of billers in a plurality of different billing data forms to transform the billing data into a common document model wherein the transformed billing data is all of the same form. A rules based parsing engine is 24 in Fig. 2 and is described in the application specification from page 26, line 5 through page 28, line 2 as operating on or parsing a wide variety of biller data types and formats in order to fit a common document or data model.

Claim 88, element (c). A computer database adapted to store the transformed billing data parsed by the parsing functionality. The database is 26 in Fig. 2. The output from the parsing engine is stored in the database as described in the application specification at page 27, line 20 through page 28, line 2.

Claim 88, element (d). Retrieving transformed billing data from the database and outputting at least some of the retrieved transformed billing data via the electronic data network for use by bill payers. Bill payers are customers 18 in Fig. 2. Presentment processors are 42 and 44 in Fig. 6 and are described in the application specification at page 30, line 10 through page 32 line 13. The presentment processors communicate with the database 26 to retrieve data therefrom and present it in a desired manner to a customer 18 via the electronic

data network (infrastructure 21) as described in the application specification at page 30, line 18 through page 31, line 11.

Claim 88, element (e). Detecting and responding to electronic communications from the plurality of billers to allow the plurality of billers individually to retrieve and review transformed billing data from the database and to alter the transformed billing data in the database. Presentation processors are 42 and 44 in Fig. 6 and are described in the application specification at page 30, line 10 through page 32 line 13. The platform 10 provides billers 12 with an interface to database 26 and presentation processors 42 and 44 which enables billers to manage the administrative functions of electronic billing, including retrieving and reviewing billing data from the database and altering the data in the database in various ways as described in the application specification at page 31, line 12 through page 32, line 13.

Appellants regard as their invention a method and a system which are capable of automatically aggregating the bills of customers from a wide variety of different Internet-accessible sources at which the customers' bills are available irrespective of the implementation standards of the various sources of the billing information. Customers enter their access information for any of a wide variety of Internet accessible electronic bill sources at which the customers may access their bills into an interface. The present invention then uses a variety of software agents or "bots" to periodically access each of the Internet accessible bill sources using

the information provided by each of the customers to access and that customer's bills information, following which all of the bills are integrated into a single display of the customer's bills. The software agent programs used to obtain billing information from the Internet accessible bill sources obtains both bill summary information such as the account number, the statement date, the bill amount, the payment due date, the minimum amount, and the total amount due, but also obtains display information for each bill. This display information (the hypertext markup language that the biller sites use to display the bill) is processed by the software agent so that the billing information can be displayed by method and system of the present invention as a bill image which is essentially identical to the way it is displayed by the Internet accessible bill sources. Other features of the present invention include its ability to validate each customer's user ID and password, to give advance warning of any Internet accessible bill source problems prior to the payment initiation date, scheduling access to bills at predetermined times, assessing the validity of bill data, recognizing a change in Internet accessible bill source websites, as well as integrating bill data obtained from the Internet accessible bill sources with bill data received electronically from billers or even bill data obtained from paper bills.

VI. Grounds of Rejection to be Reviewed on Appeal

Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50 and 82-97 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Savage et al. (U.S. Published Patent Application No. US 2002/0026394 A1).

For the purposes of discussion herein, each independent claim (Claims 82 and 88) will be argued separately, inasmuch as the invention of each such independent claim is separately and patentably distinguishable over the cited prior art.

VII. Argument

A. Summary of Arguments Presented on Appeal.

Each of independent Claims 82 and 88 includes one or more elements, steps, and/or limitations which are not taught or suggested by the cited reference. Since Claims 82 and 88 each include elements, steps, and/or limitations which are not taught or suggested in the art, the rejection of independent Claims 82 and 88 as being anticipated by the cited reference under 35 U.S.C. § 102(e) is incorrect and cannot be sustained for this reason. In the following sections of this Appeal Brief, this argument will be made with respect to each of independent Claims 82 and 88, pointing out the elements, steps, and/or limitations thereof that are not taught or suggested in the cited reference.

B. Brief Discussion of the Reference Cited.

Savage, et al describes a computer based system and method for combined

billing for a customer on a plurality of customer accounts. For example, credit card bills, utility bills, etc. may be combined in a single statement that is presented to a customer. A detailed presentation of the methods taught in Savage, et al is presented in Figs. 22 and 23 and paragraphs [0104]-[0110] thereof. As taught therein, a vendor (biller) creates and sends a flat file of vendor line items to a bill aggregator. The aggregator receives the files, verifies formatting of the line item, returns invalid items, and performs various checks and calculations on the data received. (Fig. 21.) The data from the bill aggregator is used to render and deliver a bill to a customer, by paper invoice, electronic (web based) invoice, etc., for those customers who have requested a combined bill.

C. Brief Overview of the Invention as Claimed and the Advantages Thereof

The claims under appeal are drawn to a system and method that provides an adaptive and dynamic common document model for electronic bill presentment and payment in which a biller may maintain control over the biller's billing data after the data has been transformed from the format in which it was provided by the biller into a common document format

The invention as claimed provides an electronic bill presentment and payment (EBPP) system and method which provides a common document model, allowing a plurality of billers to cooperatively present and accept payment of bills. The system and method as claimed parses the biller's data stream into a common

document model. The transformed data are stored in a database. The use of the common format document model and the universality of its structure allows the plurality of billers using the claimed system or method to maintain control, from a biller interactivity functionality, over their billing data and how it is presented on any desired platform using any desired applications, formats and protocols. In other words, the system and method as claimed can accommodate individual data sets from, for example, both a first and second biller without mandating a particular template (for the billers to follow) for both billers. Essentially, the common model document processing functionality as claimed provides for a generic conversion process that is not confined to a particular industry, biller, or type of customer. Thus, the invention as claimed provides for dynamic structural processing and conversion of a plurality of bill data types.

Although Savage, et al. describes and suggests combining bills from various different billers into a combined billing statement, it is respectfully submitted that this reference does not describe in any detail how data presented in different form from different billers is to be handled.

D. Arguments With Regard to the Rejection of Independent Claim 82 and Claims 2-10, 13, 17, 39, 41-43, 50, 83-87, and 94-97 which Depend Therefrom.

1. The Cited Reference Does Not Anticipate Claim 82.

As discussed above, independent Claim 82 is drawn to a bill presentment and payment system adapted to receive billing data from a plurality of billers in a

plurality of different billing data forms, in which a parsing functionality is used to transform such billing data in different forms into a common document model wherein all of the billing data has the same form, wherein the transformed billing data is stored in a database and such transformed billing data is retrieved from the database to be output to bill payers, and in which the plurality of billers are allowed to retrieve, review, and alter the transformed billing data in the database.

It is first respectfully submitted that it is well established that a claim is anticipated under 35 U.S.C. §102(e) "only if each and every element that is set forth in the claim is found, either expressly or inherently described, in a single prior art reference". *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). For anticipation, there must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention. *Scripps Clinic & Res. Found. v. Genentech, Inc.*, 927 F.2d 1565, 18 USPQ2d 1001 (Fed. Cir. 1991). In other words, the absence from the reference of any claimed element negates anticipation. *Kloster Speedsteel AB v. Crucible, Inc.*, 793 F.2d 1565, 230 USPQ 81 (Fed. Cir., 1986). (See also MPEP 2131.) As will now be discussed in detail, there are at least three features or elements of Claim 82, an input processing functionality, a parsing functionality, and a biller

interactivity functionality, that are not described or suggested in the cited reference. Therefore, Claim 82 is not anticipated by the cited reference under 35 U.S.C. §102(e).

Independent Claim 82 features as an element thereof an input processing functionality adapted to receive billing data from a plurality of billers in a plurality of different billing data forms. It is respectfully submitted that this element of Claim 82 is not described or suggested in the cited reference. In contrast, the system and method of Savage, et al. appears to require that all billing data be received in the same flat file line item charge format. For example, Savage, et al. specifically states that line items received by the bill aggregator are verified for the proper form and returned if invalid. (See paragraph [0104] of Savage, et al.)

Independent Claims 82 further features as an element thereof a parsing functionality for handling billing data received from a plurality of billers in a plurality of different billing data forms, including parsing the data to transform the billing data into a common document model. It is respectfully submitted that Savage, et al. does not describe or suggest such a parsing functionality, since the system and method described in Savage, et al requires that all data be received in a pre-established flat file line item format.

Independent Claim 82 also features a biller interactivity functionality wherein a biller is able to retrieve and review data after it has been received and transformed and alter the transformed billing data. It is respectfully submitted that

this feature is not described or suggested by the cited reference. Nothing in Savage, et al. describes or suggests that billers have the ability to retrieve and review data after it has been delivered to the bill aggregator described therein.

2. Detailed Arguments with Respect to Examiner's Reasons for Rejecting Claim 82

In the final Office Action of September 30, 2005, the Examiner cites Figs. 1, 2, 3, 6, 8, 2.3 (there is no Fig. 2.3 in Savage et al., so it will be assumed that Fig. 23 was meant) , and 30 and paragraphs 0003, 0004, 0013, 0015, 0018, 0021, 0023, 0054, 0055, and 0058 of Savage et al. as providing that teachings that anticipate each and every element of Claim 82. (The Examiner does not state which figures or paragraphs of Savage et al. are believed to correspond to which elements of Claim 82. Also, this same group of figures and paragraphs of Savage et al. is cited repeatedly by the examiner as providing the teachings for anticipation of all of the pending claims, both independent and dependant.) We will now look briefly at each of these figures and paragraphs of Savage et al. to examine what, in fact, they do teach, and to show that none of these figures or paragraphs teach or suggest the input processing functionality, parsing functionality, and biller interactivity functionality elements of Claim 82.

Fig. 1 of Savage et al. shows a receivable management function that receives and aggregates billing data from a variety of communications, retail, energy, and financial billers. There is no suggestion that the billing data to be

aggregated is received from the billers in different billing data forms and is transformed into a common document model by the receivable management function. The receivable management function provides billing statements to customers, and provides customer service and remittance processing functions. There is no suggestion that the various billers themselves have any access to the billing data once it is sent to and aggregated by the receivable management function.

Fig. 2 of Savage, et al. shows information flow between vendor and retail company billers, customers, and financial institution systems for generating combined billing statements. Information flow is shown as being two-way between each of these components. Once again, there is no suggestion that the information provided to the financial institution systems is received from the billers in different billing data forms and is transformed into a common document model by the financial institution systems. Also, there is no suggestion that the billers themselves have any access to billing information once it is sent to the financial institution system.

Fig. 3 of Savage, et al. is a schematic diagram which illustrates the primary software modules for the system of combined billing being described. Note that none of the illustrated modules describe or suggest transforming billing data received from billers in different billing data forms into a common document model. Also, none of the illustrated software modules suggest that the billers

themselves have any access to billing information once it is processed by the system.

Fig. 6 of Savage, et al. is a flow chart which provides further detail regarding the process of the customer making an inquiry in the system and method of combined billing being described. This flow chart does not mention billers and thus does not describe or suggest receiving billing data from billers in different billing data forms and transforming that data into a common document model. Also note that in the process being described the customer contact is with a customer service representative (CSR) that accesses databases associated with the combined billing system being described. The CSR may send a request to a Fulfillment System to send information to a customer resulting from a customer inquiry. There is no suggestion that the billers themselves have any access to the billing information in the combined billing system database.

Fig. 8 of Savage et al. is a flow chart which provides further detail regarding the process of order entry or order capture for products and services for the customer in the system and method of combined billing being described. This shows a process that occurs between a customer and a CSR of the combined billing system. This flow chart does not mention billers and thus does not describe or suggest receiving billing data from billers in different billing data forms and transforming that data into a common document model. Nor is there any suggestion in the process illustrated that the billers themselves have any access to

the billing information in the combined billing system.

Fig. 23 of Savage et al. is an illustration showing that billing for various products and services from different vendors (e.g., energy and communications vendors) can be bundled in the combined billing system being described and a discount applied to the customer bill for such bundled products and services. This illustration obviously does not describe or suggest receiving billing data from billers in different billing data forms and transforming that data into a common document model. Nor does it describe or suggest that the billers themselves have any access to the billing information in the combined billing system.

Fig. 30 of Savage et al. is a chart depicting annual expenditures by industry. This chart also obviously does not describe or suggest receiving billing data from billers in different billing data forms and transforming that data into a common document model. Nor does it describe or suggest that billers themselves have any access to billing information in a combined billing system.

Paragraph [0003] of Savage et al. reads as follows:

[0003] Therefore, in order to make money, it is necessary for credit card providers to devise a way to lower infrastructure cost. A credit card provider has little control over its cost of financing. Therefore, the credit card provider must look at operating cost and endeavor to think creatively on how it can reduce such costs in order to give itself a strategic cost advantage. One possible way to reduce cost is to reduce the level of customer service, which would likely create dissatisfied customers. A far more attractive way to reduce cost is to leverage services over a bigger infrastructure, for example, by combining billing with multiple providers of goods and/or services. An attractive market to target is industries that provide recurring services, and statements, to the consumer. These are

industries such as telephony, insurance/annuities, cable/pay television, the energy markets (gas, water, and electricity), and home security. Service providers such as energy companies are shifting to a deregulated industry like that of the airline, financial and long distance telecommunications industries. Customers are able, or will be able, to choose from a wide variety of marketing entities which will provide their electricity. This choice encourages energy service companies to add value to their offering by lowering cost and developing new products and services and, in a sense, competing to be full home services provider.

Paragraph [0004] of Savage et al. reads as follows:

[0004] The electric and utility industries have annual revenues which exceed the yearly revenue of the long distance telecommunications industry and the local phone market, and these industries together have combined revenues that come close to rivaling the overall sum spent on all general purpose credit cards. Proposed deregulation includes, for example, the creation of non-profit corporations in charge of buying power from current monopoly power companies and for monitoring the transmission of power throughout a state, as well as the restructuring of utility companies to become local power distribution companies. In other words, under proposed deregulation, energy companies move away from vertical integration and divide the functions of generation (i.e., managing power plants to produce electricity); transmission (i.e., moving electricity from the power plant to the factory, office, or home); distribution (i.e. retailers marketing to the public); and marketing (i.e., selling electricity and the services associated with it to end users and maintaining the customer relationship). Similar to other deregulated industries, increased market competition and the ability for customers to select from multiple energy providers poses a great risk for energy companies, for example, in loss of share and increased losses. Deregulation opens opportunities for credit card providers, as well as for energy providers. Credit card providers increased overall card usage from 11% of all transaction in 1980 to 17% in 1998. Utility payments provide another way of increasing that percentage.

These two paragraphs describe challenges and opportunities for reducing costs in the credit card and utility industries. It is obvious that neither paragraph describes or suggests receiving billing data from billers in different billing data forms and

transforming that data into a common document model. Nor do these paragraphs describe or suggest that the billers themselves have any access to the billing information in a combined billing system.

Paragraph [0013] of Savage et al. reads as follows:

[0013] It is another feature and advantage of the present invention to provide a computerized method and system of combined billing which enables the billing of multiple product lines on a single statement, sharing the financial institution savings with the financial institution's clients and consumers, upselling customers of the financial institution's clients to become credit card customers, maximizing financing opportunities by purchasing receivables at a discount.

This paragraph describes some features and advantages of the method and system of combined billing being described. Receiving billing data from billers in different billing data forms and transforming that data into a common document model are not described or suggested as features. Allowing billers themselves to have access to the billing information in the combined billing system is not described as a feature.

Paragraph [0015] of Savage, et al. reads as follows:

[0015] In an embodiment of the present invention, a financial institution, such as a bank, which issues credit cards, contracts with various companies to have all of their bill data delivered to the financial institution electronically. The financial institution stores the data at a customer level in its computer system. At the appropriate cycle time for a particular customer's account (i.e., the time at which the financial institution delivers a statement once a month to the customer), the financial institution's computer system automatically generates a combined statement and delivers it to the customer. When the financial institution receives the data electronically, for example, from the telephone company, it is stored in the financial institution's computer database. A single transaction is written out

to by the financial institution's account receivable computer system, sometimes referred to herein as "total systems." At different times in the month, the financial institution receives data electronically, for example, two or three different phone bills for a customer, which are reading out transaction one at a time to the financial institution's account receivable system. The financial institution can also be receiving, for the same customer, the customer's cable company, gas, water, and electric bill data, each reading out a transaction into the financial institution's account receivable system. When the account receivable system actually cycles, having accumulated the entire balance, any finance charge, late payment charge, or miscellaneous fees, computing the minimum payment amount and basically keeping the account in balance, the data image is forwarded to the financial institution from the financial institution's processing system, "total systems." The financial institution identifies each of those individual transaction that are read out and pulls them off of the statement and replaces them with the full image of the statement. Accordingly, the customer receives a complete branded statement for the customer's energy, water, gas, cable, and telephony, and a summary page with multiple payment options from which the customer can pay the account.

This paragraph teaches that a financial institution receives billing data electronically from a variety of vendors in order to generate a combined billing statement for a customer. However, this paragraph does not describe or suggest that the billing data received from the various billers is received in different forms. Thus, the paragraph also does not describe or suggest transforming billing data received in a variety of different forms into a common document model. The paragraph also does not describe or suggest that the billers themselves have any access to the billing information once it is provided to the financial institution.

Paragraph [0018] of Savage et al. reads as follows:

[0018] The combined billing method and system of the present invention affords providers of goods and/or services the advantages of strategic cost savings and distribution opportunities. It also affords such

providers the ability to leverage off the financial institution's expertise in receivable management, marketing, billing, and multi-premise billing (e.g., combining multiple telephone statements that might otherwise go out at different times during the month from different premises into a single customer account). It also gives such providers the ability to integrate their own multiple accounts for a single customer with a single point-of-contact customer care number, so that when the customer calls, the financial institution understand exactly which account is meant. If a customer has, for example, telephone, energy and gas, and calls the financial institution about the telephone account, the customer is automatically routed into the telephony service provider for handling. In other words, the system is integrated to enable a consumer to reach a single point-of-contact and each individual provider of goods and/or services to continue their own customer care and servicing, while allowing the financial institution to handle the complex part of billing and data management.

This paragraph discusses some of the advantages of the combined billing method and system being described, but does not describe or suggest that billing data received by a financial institution from various billers is received in different forms. Thus, the paragraph also does not describe or suggest transforming billing data received in a variety of different forms into a common document model. The paragraph also does not describe or suggest that the billers themselves have any access to the billing information once it is provided to the financial institution.

Paragraph [0021] of Savage et al. reads as follows:

[0021] In an embodiment of the present invention, the financial institution is able to increase its revenue through, for example, statementing savings of sharing or providing a service to the energy companies. The financial institution also increases revenue through financing with cost of funds and securitization at a lower cost than those of energy companies. Additionally, revenue is increased by customer servicing, namely, managing more efficiently than a utility via VRU technology. Further, the financial institution increases revenue by risk management in managing credit losses and fraud claims. The financial institution likewise increases

revenue in collections by managing collections more efficiently than a utility because of technology. Financial institution revenues are also increased by exporting bank rates, such as interest charges and fees on receivables that these companies might not be able to charge. In addition, financial institution revenues are increased through fee services related to marketing (acquisitions and portfolio) and information data mining. In order to satisfy all types of consumers, the financial institution furnishes management on various levels. For example, the financial institution performs billing management for a utility company in combination with a calling card, long distance and calling card, or long distance and calling card plus credit card. Consumers are incented to "add-on" to a single utility bill (i.e. with cash back or rewards points), while enjoying the convenience of having only one bill to pay.

This paragraph describes various ways in which a financial institution may increase its revenue by operating a combined billing system as described. However, this paragraph does not describe or suggest that billing data received by the financial institution from various billers is received in different forms. Thus, the paragraph also does not describe or suggest transforming billing data received in a variety of different forms into a common document model. The paragraph also does not describe or suggest that the billers themselves have any access to the billing information once it is provided to the financial institution.

Paragraph [0023] of Savage et al. reads as follows:

[0023] In an embodiment of the present invention, one or more account charges are automatically formatted and transmitted to a bill aggregator, which aggregates the account charges. The account data from which the account charges are calculated includes usage data, such as energy usage data. The usage data is used to calculate usage charges according to a predefined usage pricing schedule, and the usage charges are used to calculate an associated usage tax according to a predefined usage charge tax schedule. The account charge is automatically calculated from the usage charge and the associated usage tax. When account data is

received by the financial institution computer application, it is automatically validated by comparing the data with pre-defined account data parameters, and data which falls outside the parameters is automatically rejected. Account charges are also automatically validated by comparing the account charges to predefined account charge parameters and rejecting charges which fall outside the predefined parameters. The account charges are aggregated by automatically assembling the charges and automatically calculating a discount for the assembled charges according to a predefined discount schedule. The aggregated account charges are calculated from the assembled account charges and the associated discount, and the aggregated account charges are likewise validated.

This paragraph describes how, in an embodiment of the combined billing system being described, one or more account charges are automatically formatted and transmitted to a bill aggregator, which aggregates the account charges. As described, "formatting" in this case means employing usage data, such as energy usage data, received by a financial institution, along with a predefined usage pricing and tax schedule, to calculate the account charges. The resulting account charges are aggregated by automatically calculating a discount for the assembled charges according to a predefined discount schedule. Note that this paragraph does not describe or suggest that the usage data received by the financial institution may be received from various billers in different forms. Thus, the paragraph also does not describe or suggest transforming billing data received in a variety of different forms into a common document model. The paragraph also does not describe or suggest that the billers themselves have any access to the billing information once it is provided to the financial institution.

Paragraph [0054] of Savage et al. reads as follows:

[0054] Referring now in detail to an embodiment of the invention, and example of which is illustrated in the accompanying drawings, **FIG. 1** shows on [sic] overview of the key components for an application of the combined billing system for an embodiment of the present invention and the flow of information between the components. Referring to **FIG. 1**, the financial institution **100**, such as a bank, is the entity which provides back office support for products and services, such as communications **102** (e.g., long distance **200**, local **202**, wireless **204**, and Internet **206**); energy **104** (e.g., cable **208**, home security **210**, electric **212**, water **214**, and gas **216**); retail **106** (credit cards **218** and retail **220**); and financial **108** (e.g., insurance **222**, investments **224**, auto **226**, bank statements **228**, installments **230** and mortgages **232**). The consumer or customer **110** is the person or entity, for example, at a terminal **112**, such as a personal computer, who purchases the products and services that are offered and who is billed by the financial institution **100** and who remits payment to the financial institution **100**. **FIG.1a** presents a flow diagram of the combined application process.

This paragraph describes the key components of the combined billing system being described, including a financial institution, various service providers (communications, energy, retail, and financial), and the consumer or customer. This paragraph does not describe or suggest that billing data is received by the financial institution from the various service providers in different forms. Thus, the paragraph also does not describe or suggest transforming billing data received in a variety of different forms into a common document model. The paragraph also does not describe or suggest that the billers themselves have any access to the billing information once it is provided to the financial institution.

Paragraph [0055] of Savage et al. reads as follows:

[0055] **FIG. 2** is a simple schematic overview of key components for an application of an embodiment of the present invention, which provides further detail regarding the flow of information shown in **FIG. 1**. Referring to **FIG. 2**,

the "retail company" **234** is the entity which offers products and services to the retail market and is the client of the financial institution **100**. In general, "supply chain vendors" **140** are the entities which provide the products and services that are offered for sale through retail company channels. Computer systems **114** of the financial institution **100** are configured to perform billing functions, such as bill calculation, bill aggregation and statementing, and payment processing. The financial institution's customer service representative (CSR) **101** is the person, for example, at the terminal **103**, communicating with the customer **110** and the financial institution's computer systems **114**. Bill calculation by computer systems **114** of financial institution **100** involves receiving and validating energy usage data feed, for example, from a vendor **140**, such as energy retailer **104** shown in **FIG. 1**, automatically calculating charges and taxes based on the energy pricing parameters of the energy retailer **104**, and generating usage, accounting, and settlement reports to the energy retailer **104**. Bill aggregation and statement by computer systems **114** involves automatically combining, for example, the energy **104**, telecommunications **102** and credit card **106** statements, using the financial institution's credit card system interchange network to speed bundle offers to market, calculating bundled discounts, rebates and rewards, and automatically rendering a combined statement, such as paper, fax, web-based or disk to the customer **110**. Payment processing by the financial institution's computer systems **114** is the processing of payment received from the customer **110**, for example, by check, autopay, or the Internet.

This paragraph provides further detail regarding the flow of information between the components of the combined billing system being described. As described, computer systems of a financial institution are configured to perform billing functions, such as bill calculation, bill aggregation and statementing, and payment processing. Bill calculation involves receiving and validating energy usage data feed, for example, from a vendor, automatically calculating charges and taxes based on the energy pricing parameters of the energy retailer, and generating usage, accounting and settlement reports to the energy retailer. Bill aggregation and statementing involves automatically combining, for example, the energy, telecommunications, and credit card statements and automatically rendering a

combined statement. The paragraph does not describe or suggest that the billing data received by the financial institution from the various billers is received in different forms. Thus, the paragraph also does not describe or suggest transforming billing data received in a variety of different forms into a common document model. The paragraph also does not describe or suggest that the billers themselves have any access to the billing information once it is provided to the financial institution. In contrast, the biller only receives information back from the financial institution in the form of usage, accounting, and settlement reports.

Paragraph [0058] of Savage et al. reads as follows:

[0058] **FIG. 3** is a schematic diagram which illustrates the primary software modules of computer systems **114** for an embodiment of the present invention and further amplifies the flow of information shown in **FIGS. 1 and 2**. The software modules of computer system **114** are coupled to one another and implemented, for example, to take orders, request services, and create invoices for the retail company. These modules include, for example, order entry **116**, service contract **118**, order processing **120**, tracking system **122**, and retail company bill aggregator **124**. The order entry software modules **116** store and enable the customer service representatives (CSR) **101** to access data relative to all retail company customers **126**, bundles **128**, products **130**, components **132**, discounts **134**, orders **136**, and affinity points **138**. The service contract software module(s) **118** track all appliance service contracts and service performed against these contracts. The order processing software module(s) **120** interface with the supply chain vendors **140** to request new service, modify existing service, or terminate service. The tracking system software module(s) **122** track all outstanding items that need to be resolved and notifies the CSR **101** of any exceptions that require attention. The retail company bill aggregator software module(s) **124** accepts charges from the supply chain vendors **140** and process these charges before forwarding the charges to the financial institution aggregator (CAP system) **142**. The procession functions of the retail company bill aggregator software module(s) **124** include charge validation **144**, bill calculation for energy **146**, discount calculation **148**, and affinity point calculation.

This paragraph describes various software modules of a computer system for

implementing the combined billing system being described. This paragraph does not describe or suggest that billing data is received from various billers in different forms. Thus, the paragraph does not describe or suggest a software module for transforming billing data received in a variety of different forms into a common document model. The paragraph also does not describe or suggest that the billers themselves have any access to the billing information once it is provided to the financial institution. Rather, that only information flow between the combined billing system and the supply chain vendors that is described is via an order processing software module, to request new service, modify existing service, or terminate service, or via a retail company bill aggregator software module that accepts charges from the supply chain vendors.

Thus, it is submitted that none of the figures or paragraphs of Savage et al. that have been specifically cited by the Examiner as anticipating Claim 82, considered either separately or together, teach or suggest the elements of Claim 82 of an input processing functionality adapted to receive billing data from a plurality of billers in a plurality of different billing data forms, a parsing functionality adapted to transform the billing data received in different forms into a common document model wherein the transformed billing data is all of the same form, and a biller interactivity functionality adapted to allow a plurality of billers individually to retrieve, review, and alter the transformed billing data.

3. **Response to Examiner's Response to Arguments**

In the *Response to Arguments* section of the final Office Action in the Examiner states correctly that applicant/appellant essentially argues that the prior art fails to teach an inventive concept of receiving billing data from a plurality of billers in a plurality of different forms and parsing such data into a common document model wherein the transformed billing data is all the same form. The Examiner goes on to state: "Savage et al does not explicitly disclose that the received bills are in different format. However. It is obvious that the bills are not from the same company and therefore in different format since each company uses their own format to prepare customer invoice. For the reason above, the rejection is sustained."

Applicant strongly disagrees with the Examiner's conclusions regarding the teachings of Savage et al. First, the Examiner admits that the cited reference does not expressly describe or suggest receiving billing data in different formats. There is no reason to assume that the system described in the cited reference is inherently adapted to receive billing data in different billing data forms. It is more reasonable to assume that the system described in the cited reference requires the various billers using the system to format billing data in a format that is acceptable to the system. In fact, Savage et al. suggests that billing data is received by the system as a flat file of vendor line item charges and that items are returned as invalid if this format is not adhered to. (See paragraph [0104] of Savage et al.)

Furthermore, neither the term, nor the concept, of a "common document model", as featured in Claim 82, is mentioned in Savage et al. Additionally, although different companies may use their own format to prepare customer invoices, it is not customer invoices that are provided by the companies to the system described in Savage et al. Rather, underlying billing data, e.g., energy usage data, is provided (see paragraph [0055] of Savage et al.) and from this data a combined billing statement is generated by the system having a format defined by the combined billing system, not by the biller. (See paragraph [0110] of Savage et al.)

As discussed above, another element of Claim 82 that is not taught or suggested by Savage et al. is the biller interactivity functionality adapted to allow a plurality of billers individually to retrieve, review, and alter transformed billing data. This element of Claim 82 is not mentioned in the Examiner's *Response to Arguments*.

4. Conclusion with Regard to Claim 82

Thus, it is respectfully submitted that the cited reference does not describe or suggest an input processing functionality for receiving billing data from a plurality of billers in a plurality of different billing data forms, and thus does not describe or suggest a parsing functionality adapted to parse such data into a common document model wherein the transformed billing data is all of the same form. It is also respectfully submitted that the cited reference and does not describe or suggest a biller interactivity functionality allowing a biller the ability

to retrieve and review such transformed billing data. Each of these features is an element of pending independent Claims 82. Therefore, it is respectfully submitted that independent claim 82, as well as the claims that depend therefrom, is not anticipated by the cited reference, and are in condition for allowance, for the foregoing reasons.

E. Arguments With Regard to the Rejection of Independent Claim 88 and Claims 22-30, 32-34, and 89-93 Which Depend Therefrom

1. The Cited Reference Does Not Anticipate Claim 88

As discussed above, independent Claim 88 is drawn to a method for presenting and paying bills that includes the steps of receiving electronic billing data from a plurality of billers in a plurality of different billing data forms, parsing in a computer the received electronic billing data to transform such billing data in different forms into a common document model wherein all of the billing data has the same form, wherein the transformed billing data is stored in a database, retrieving the transformed billing data from the database to be output to bill payers, and in which electronic communications from the plurality of billers are detected and responded to to allow the plurality of billers to retrieve, review, and alter the transformed billing data in the database.

It is first respectfully submitted that it is well established that a claim is anticipated under 35 U.S.C. §102(e) "only if each and every element that is set forth in the claim is found, either expressly or inherently described, in a single

prior art reference". *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 2 USPQ2d 1051, 1053 (Fed. Cir. 1877). "The identical invention must be shown in as complete detail as is contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). For anticipation, there must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention. *Scripps Clinic & Res. Found. v. Genentech, Inc.*, 927 F.2d 1565, 18 USPQ2d 1001 (Fed. Cir. 1991). In other words, the absence from the reference of any claimed element negates anticipation. *Kloster Speedsteel AB v. Crucible, Inc.*, 793 F.2d 1565, 230 USPQ 81 (Fed. Cir., 1986). (See also MPEP 2131.) As will now be discussed in detail, there are at least three features or steps of Claim 88, a receiving step, a parsing step, and a step of detecting and responding to electronic communications from a plurality of billers, that are not described or suggested in the cited reference. Therefore, Claim 88 is not anticipated by the cited reference under 35 U.S.C. §102(e).

Independent Claim 88 features as an element thereof a receiving step of receiving billing data from a plurality of billers in a plurality of different billing data forms. It is respectfully submitted that this element of Claim 88 is not described or suggested in the cited reference. In contrast, the system and method of Savage, et al. appears to require that all billing data be received in the same flat file line item charge format. For example, Savage, et al. specifically states that

line items received by the bill aggregator are verified for the proper form and returned if invalid. (See paragraph [0104] of Savage, et al.)

Independent Claims 88 further features as an element thereof a parsing step for handling billing data received from a plurality of billers in a plurality of different billing data forms, including parsing the data to transform the billing data into a common document model. It is respectfully submitted that Savage, et al. does not describe or suggest such a parsing step, since the system and method described in Savage, et al requires that all data be received in a pre-established flat file line item format.

Independent Claim 88 also features the step of detecting and responding to electronic communications from a plurality of billers to allow billers individually to retrieve and review data after it has been received and transformed and to alter the transformed billing data. It is respectfully submitted that this feature is not described or suggested by the cited reference. Nothing in Savage, et al. describes or suggests that billers have the ability to retrieve and review data after it has been delivered to the bill aggregator described therein.

2. Detailed Arguments with Respect to Examiner's Reasons for Rejecting Claim 88.

In the final Office Action of September 30, 2005, the Examiner cites Figs. 1, 2, 3, 6, 8, 2.3 (there is no Fig. 2.3 in Savage et al., so it will be assumed that Fig. 23 was meant) , and 30 and paragraphs 0003, 0004, 0013, 0015, 0018, 0021, 0023,

0054, 0055, and 0058 of Savage et al. as providing that teachings that anticipate each and every element of Claim 88. (The Examiner does not state which figures or paragraphs of Savage et al. are believed to correspond to which elements of Claim 88. Also, this same group of figures and paragraphs of Savage et al. is cited repeatedly by the examiner as providing the teachings for anticipation of all of the pending claims, both independent and dependant.)

Provided above, in the discussion with respect to Claim 82, is a brief examination of each of these figures and paragraphs of Savage et al. examining what, in fact, they do teach. As was shown above, none of these figures or paragraphs teach or suggest the input processing functionality, parsing functionality, and biller interactivity functionality elements of Claim 82.

It can be seen from a review of the discussion of these figures and paragraphs, as presented above, that none of the figures or paragraphs of Savage et al. that have been specifically cited by the Examiner as anticipating Claim 88, considered either separately or together, teach or suggest the elements of Claim 88 of receiving billing data from a plurality of billers in a plurality of different billing data forms, parsing the billing data to transform the billing data received in different forms into a common document model wherein the transformed billing data is all of the same form, and detecting and responding to electronic communications from a plurality of billers to allow billers individually to retrieve, review, and alter the transformed billing data.

3. Response to Examiner's Response to Arguments.

In the *Response to Arguments* section of the final Office Action in the Examiner states correctly that applicant/appellant essentially argues that the prior art fails to teach an inventive concept of receiving billing data from a plurality of billers in a plurality of different forms and parsing such data into a common document model wherein the transformed billing data is all the same form. The Examiner goes on to state: "Savage et al does not explicitly disclose that the received bills are in different format. However. It is obvious that the bills are not from the same company and therefore in different format since each company uses their own format to prepare customer invoice. For the reason above, the rejection is sustained."

Applicant strongly disagrees with the Examiner's conclusions regarding the teachings of Savage et al. First, the Examiner admits that the cited reference does not expressly describe or suggest receiving billing data in different formats. There is no reason to assume that the system described in the cited reference is inherently adapted to receive billing data in different billing data forms. It is more reasonable to assume that the system described in the cited reference requires the various billers using the system to format billing data in a format that is acceptable to the system. In fact, Savage et al. suggests that billing data is received by the system as a flat file of vendor line item charges and that items are returned as invalid if this format is not adhered to. (See paragraph [0104] of Savage et al.)

Furthermore, neither the term, nor the concept, of a "common document model", as featured in Claim 82, is mentioned in Savage et al. Additionally, although different companies may use their own format to prepare customer invoices, it is not customer invoices that are provided by the companies to the system described in Savage et al. Rather, underlying billing data, e.g., energy usage data, is provided (see paragraph [0055] of Savage et al.) and from this data a combined billing statement is generated by the system having a format defined by the combined billing system, not by the biller. (See paragraph [0110] of Savage et al.)

As discussed above, another step or element of Claim 88 that is not taught or suggested by Savage et al. is detecting and responding to electronic communications from a plurality of billers to allow the plurality of billers individually to retrieve, review, and alter transformed billing data. This element of Claim 88 is not mentioned in the Examiner's *Response to Arguments*.

4. Conclusion with Regard to Claim 88

Thus, it is respectfully submitted that the cited reference does not describe or suggest receiving billing data from a plurality of billers in a plurality of different billing data forms, and thus does not describe or suggest parsing such data into a common document model wherein the transformed billing data is all of the same form. It is also respectfully submitted that the cited reference does not describe or suggest detecting and responding to electronic communications from a plurality of billers to allow the billers individually to retrieve and review such

transformed billing data. Each of these features is an element of pending independent Claim 88. Therefore, it is respectfully submitted that independent claim 88, as well as the claims that depend therefrom, is not anticipated by the cited reference, and are in condition for allowance, for the foregoing reasons.

E. Additional Arguments for the Allowability of Dependent Claims 85, 91, 95, and 97.

1. Dependent Claims 85 and 91.

Dependent claims 85 and 91, which depend, indirectly, from independent claims 82 and 88, respectively, feature parsing the billing data received from a plurality of different billers in a plurality of different forms using rules of conversion defined using a uniform rules definition language. (See, e.g., the application specification at pages 26 and 27.) It is respectfully submitted that Savage, et al does not describe or suggest a rules based process defined using a uniform rules definition process to parse biller billing data in a plurality of different forms.

As discussed above, Savage, et al. does not teach or suggest receiving data in a plurality of different billing data forms, and thus does not describe or suggest the parsing functionality, and thus does not teach or suggest rules of conversion defined using a uniform rules definition language.

2. Dependent Claim 95.

Dependent Claim 95 further distinguishes over Savage, et al. by reciting a

biller interactivity functionality coupled to the database adapted to allow the plurality of billers to identify market segments of said bill payers according to market rules and information retrieved from said database. There is no mention of the billers being able to identify market segments of bill payers in the Savage, et al. Rather, Savage, et al. suggests that retrieving marketing information from a database of billing data may be a service that is provided by the financial institution acting as the bill aggregator. Savage, et al. does not describe or suggest that the billers may have access to such data. Thus, it is respectfully submitted that claim 95 and the claims that depend therefrom are allowable over the cited references for this additional reason.

3. Dependent Claim 97.

No evidence is provided for the anticipation, teaching, or suggestion of a modularized input processing engine, as recited in dependent Claim 97. The advantage of using a modularized processing engine is that this facilitates scalability and expandability. For example, if a new form of biller data is encountered or must be dealt with for transformation into a form and format, the modularized input processing engine of Claim 97 allows for the processing of the new biller data in a modular way (see Applicants' Specification, page 25, lines 17-19). There may be separate engines for each new form of data so that the output of each preprocessing engine is ready for processing by a rule-based parsing engine. In other words, because the preprocessing of biller data is modularized, a

new input processing engine can easily be integrated to handle new data types.

Therefore, Claim 97 is believed to be patentable for the additional reasons provided.

F. Conclusion.

The independent claims of the present application are drafted in a manner which clearly defines them over the prior art. Accordingly, Appellants believe the invention as presently claimed to be novel and non-obvious over the cited art. Appellants accordingly respectfully request the removal of all rejections of the pending Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50 and 82-97.

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VIII. Claims Appendix

1. (cancelled)
2. (previously presented): The system according to Claim 82, wherein said parsing functionality is adapted to parse data from a print stream of data provided by said plurality of billers.
3. (previously presented): The system according to Claim 82, wherein said parsing functionality is adapted to parse data from a data interchange stream of data provided by said plurality of billers.
4. (previously presented): The system according to Claim 82, wherein said parsing functionality is adapted to parse data from a financial data stream provided by said plurality of billers.
5. (previously presented): The system according to Claim 82, wherein said presentation functionality is adapted to output transformed billing_data for use by said bill payers using financial software.
6. (previously presented): The system according to Claim 82, wherein said presentation functionality is adapted to output transformed billing data for use by said bill payers not using financial software.
7. (previously presented): The system according to Claim 82, wherein said presentation functionality is adapted to output transformed billing_data for use by said

bill payers using a browser.

8. (previously presented): The system according to Claim 82, wherein said presentation functionality employs style sheet functionality in order to render transformed billing_data in a form suitable for said bill payers.

9. (previously presented): The system according to Claim 82, wherein transformed billing data is provided to said bill payers using markup language.

10. (previously presented): The system according to Claim 82, further comprising an interactivity functionality adapted to detect and respond to communications from said bill payers by at least (i) retrieving transformed billing_data from said database and presenting it to said bill payers in a form requested by said bill payers; and (ii) altering transformed billing data in said database corresponding to said bill payers according to said communications.

11-12. (cancelled)

13. (previously presented): The system according to Claim 82, wherein the biller interactivity functionality is adapted to allow said plurality of billers to alter appearance and content of bills presented to said bill payers, said biller interface allowing said plurality of billers to communicate with said bill payers regarding said bills.

14-16. (cancelled)

17. (previously presented): The system according to Claim 87, wherein the third

party interactivity functionality is a financial source interface adapted to send and receive communications to and from at least one financial entity and to alter the transformed billing data in said database according to said financial source communications.

18-21. (cancelled)

22. (previously presented): The method of Claim 88, wherein said billing data is received as a print stream of data provided by said plurality of billers.

23. (previously presented): The method of claim 88, wherein said billing data is received as a data interchange stream of data provided by said plurality of billers.

24. (previously presented): The method of Claim 88, wherein said billing data is received as a financial data stream provided by said plurality of billers.

25. (previously presented): The method of Claim 88, wherein said at least some of said transformed billing data is output for use by said bill payers using financial software.

26. (previously presented): The method of Claim 88, wherein said at least some of said transformed billing data is output for use by said bill payers not using financial software.

27. (previously presented): The method of Claim 88, wherein said at least some of said transformed billing data is output for use by said bill payers using a browser.

28. (previously presented): The method of Claim 88, wherein said at least some of

said transformed billing data is output using style sheet functionality in order to render information in a form suitable for said bill payers.

29. (previously presented): The method of Claim 88, wherein said at least some of said transformed billing data is provided to said bill payers using markup language.

30. (previously presented): The method of Claim 88, further comprising the step of detecting and responding to communications from bill payers by at least (i) retrieving transformed billing data from said database and presenting it to said bill payers in a form requested by said bill payers and (ii) altering transformed billing data in said database corresponding to said bill payers according to said communications.

31. (cancelled)

32. (previously presented): The method of Claim 88, further comprising the step of allowing said plurality of billers to alter appearance and content of bills presented to said bill payers.

33. (previously presented): The method of Claim 88, further comprising the step of allowing said plurality of billers to communicate with said bill payers regarding said bills.

34. (previously presented): The method of Claim 93, wherein detecting and responding to communications to and from a third party included detecting and responding to communication from at least one financial entity and altering and storing information according to said communications.

35-38. (canceled)

39. (previously presented): The system of Claim 94, wherein said interface is adapted to allow said bill payers to specify the location of said output.

40. (cancelled)

41. (previously presented): A system according to Claim 95, wherein said biller interactivity functionality is further adapted to allow said plurality of billers to alter appearance and content of bills presented to said bill payers based on said market segments.

42. (previously presented): A system according to Claim 95, wherein said biller interactivity functionality is further adapted to allow said plurality of billers to send marketing messages to said bill payers based on said market segments.

43. (previously presented): A system according to Claim 95, wherein said biller interactivity functionality is further adapted to allow said plurality of billers to communicate with said bill payers based on said market segments.

44-49. (cancelled)

50. (previously presented): A system according to Claim 82, wherein said biller interactivity functionality and said presentation functionality are further adapted to present substantially the same information to said plurality of billers and said bill payers in order to allow said plurality of billers to interact with said bill payers regarding said same information.

51-81. (cancelled)

82. (previously presented): An electronic bill presentment and payment system for presenting and paying bills via an electronic data network, comprising:

- (a) an input processing functionality adapted to receive billing data from a plurality of billers in a plurality of different billing data forms;
- (b) a parsing functionality adapted to parse the billing data received from the plurality of billers in a plurality of different billing data forms to transform the billing data into a common document model wherein the transformed billing data is all of the same form;
- (c) a database adapted to store the transformed billing data parsed by the parsing functionality;
- (d) presentation functionality coupled to the database and adapted to retrieve transformed billing data from the database and to output at least some of the retrieved transformed billing data via the electronic data network for use by bill payers; and
- (e) biller interactivity functionality coupled to the database and adapted to allow the plurality of billers individually to retrieve and review transformed billing data from the database and to alter the transformed billing data in the database.

83. (previously presented) The system according to Claim 82 wherein the electronic data network is the Internet.

84. (previously presented): The system according to Claim 82 wherein the parsing functionality is adapted to parse the billing data received from the plurality of billers to transform the billing data into a common document model using rules of conversion and a rules application process.

85. (previously presented): The system according to Claim 84 wherein the rules of conversion are defined by an operator using a uniform rules definition language.

86. (previously presented): The system according to Claim 82 wherein the common document model is adapted to accommodate the transformed billing data from the plurality of billers and wherein each of the plurality of billers has a subset of data and attributes accommodated by the common document model.

87. (previously presented): The system according to Claim 82 comprising additionally a third party interactivity functionality coupled to the database and adapted to allow a third party to retrieve for review transformed billing data from the database and to alter the transformed billing data in the database.

88. (previously presented): A method for presenting and paying bills via an electronic data network, comprising:

- (a) receiving electronic billing data from a plurality of billers in a plurality of different billing data forms;
- (b) parsing in a computer the electronic billing data received from the plurality of billers in a plurality of different billing data forms to transform the billing data into a common document model wherein the transformed billing data is all of the same form;
- (c) a computer database adapted to store the transformed billing data parsed by the parsing functionality;
- (d) retrieving transformed billing data from the database and outputting at least some of the retrieved transformed billing data via the electronic data network for use

by bill payers; and

(e) detecting and responding to electronic communications from the plurality of billers to allow the plurality of billers individually to retrieve and review transformed billing data from the database and to alter the transformed billing data in the database.

89. (previously presented): The method according to Claim 88 wherein the electronic data network is the Internet.

90. (previously presented): The method according to Claim 88 wherein the parsing the billing data received from the plurality of billers to transform the billing data into a common document model includes parsing the billing data in a computer using rules of conversion and a rules application process.

91. (previously presented): The method according to Claim 90 comprising additionally defining the rules of conversion using a uniform rules definition language.

92. (previously presented): The method according to Claim 88 wherein the common document model is adapted to accommodate the transformed billing data from the plurality of billers and wherein each of the plurality of billers has a subset of data and attributes accommodated by the common document model.

93. (previously presented): The method according to Claim 88 comprising additionally detecting and responding to communications from a third party to allow the third party to retrieve for review transformed billing data from the database and to alter the transformed billing data in the database.

94. (previously presented): The system according to Claim 82 comprising additionally a bill payer interface adapted to allow said bill payers to pay bills electronically.
95. (previously presented): The system according to Claim 82 wherein the biller interactivity functionality allows said plurality of billers to identify market segments of said bill payers according to market rules and information retrieved from said database.
96. (previously presented): The system according to Claim 87 wherein the third party interactivity functionality includes an agent interface coupled to the database and adapted to allow a plurality of agents having agency relationships with said plurality of billers to communicate with said bill payers regarding bills.
97. (previously presented): The system according to Claim 82 wherein the input processing functionality includes a modularized input processing engine adapted to preprocess billing data corresponding to a plurality of data types from the plurality of billers and providing the preprocessed billing data to the parsing functionality for parsing.

IX. Evidence Appendix

None

X. Related Proceedings Appendix

None